

The Honorable Lauren King

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STATE OF WASHINGTON, *et al.*

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States  
of America, *et al.*,

Defendants.

Case No. 2:25-cv-00244

*UNOPPOSED* MOTION OF DO NO  
HARM, INC. FOR LEAVE TO FILE  
BRIEF AS *AMICUS CURIAE* IN  
OPPOSITION TO PLAINTIFFS' MOTION  
FOR A PRELIMINARY INJUNCTION

Do No Harm, Inc., respectfully requests leave to file an *amicus* brief in opposition to Plaintiffs' motion for a preliminary injunction. Counsel for both Plaintiffs and Defendants do not oppose this motion. "The classic role of *amicus curiae* is to assist a court in a case of public interest by supplementing the efforts of counsel, and generally courts have exercised great liberality in permitting amicus briefs." *El Papel LLC v. Inslee*, No. 2:20-cv-1323-RAJ-JRC, 2020 WL 6158825, \*1 (W.D. Wash. Oct. 21, 2020) (internal quotations omitted). Therefore, this Court has accepted amicus briefs from "public interest organizations" that "have demonstrated that they have an interest in the issues presented to the Court in plaintiffs' motion for preliminary injunction" and have submitted a brief that would "be helpful regarding the

1 potential public interest ramifications beyond the parties directly involved.” *Id.*; *see also*  
2 *Macareno v. Thomas*, 378 F. Supp. 3d 933, 940 (W.D. Wash. 2019) (“District courts may  
3 consider *amicus* briefs from non-parties concerning legal issues that have potential  
4 ramifications beyond the parties directly involved or if the *amicus* has unique information or  
5 perspective that can help the court beyond the help that the lawyers for the parties are able to  
6 provide.” (internal quotations omitted)).  
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8 Do No Harm is a nonprofit membership organization that includes over 10,000  
9 physicians, nurses, medical students, patients, and policymakers. It is committed to ensuring  
10 that the practice of medicine is driven by scientific evidence rather than ideology. To that end,  
11 Do No Harm has submitted *amicus* briefs in multiple courts regarding the medical and surgical  
12 interventions at issue in this case, including *United States v. Skrmetti*, No. 23-477 (U.S.); *Poe*  
13 *v. Drummond*, No. 23-5110 (10th Cir.); and *Dekker v. Weida*, No. 4:22-cv-325-RH-MAF (N.D.  
14 Fla.). In addition, Do No Harm created a database tracking the number of minors who have  
15 been subjected to the interventions at issue here. *See Do No Harm Launches First National*  
16 *Database Exposing the Child Trans Industry*, Do No Harm (Oct. 8, 2024),  
17 <https://bit.ly/4f2AJPt>. Do No Harm’s proposed *amicus* brief would be helpful to the Court  
18 because it outlines the practice of evidence-based medicine, explains how the principles of  
19 evidence-based medicine demonstrate that the interventions at issue are not supported by  
20 reliable medical evidence, and assesses particular medical and scientific assertions made in  
21 Plaintiffs’ motion for a preliminary injunction. The Court should grant Do No Harm’s motion  
22 and accept its proposed *amicus* brief, a copy of which has been submitted with this motion.  
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3 Respectfully submitted, this 25th day of February, 2025.  
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5 I certify that this motion contains, 406 words, in  
6 compliance with Local Civil Rule 7(e)(3).

7 By: /s/ Keith Kemper

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27 \* *Pro hac vice* applications forthcoming

*Counsel for Do No Harm, Inc., as amicus curiae*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of February 2025, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system, which will send notification of such filing to all parties who are registered with the CM/ECF system.

DATED this 25th day of February 2025.

/s/ Keith Kemper  
Keith Kemper